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Dear Diane, Susan, and Gordon,

The Vision 2030 Group is composed of a number of International District community stakeholders that have been keenly involved in the City's Livable South Downtown planning process. Vision 2030 represents three years of collaborative work to develop a shared, comprehensive vision for the District.

Our 2030 vision is of an International District that is a diverse, dense neighborhood featuring a vibrant mix of residential and commercial activity and has maintained its significance as the historic cultural and social hub for the region's Asian Pacific Island communities. We seek to ensure that future development helps maintain significant housing affordability, while supporting the neighborhood's small ethnic businesses, community service organizations, and cultural institutions.

The Vision 2030 Group strongly supports a holistic planning approach that will capture public benefits in exchange for development that occurs as a result of increased zoning capacity and density. The Livable South Downtown Planning Study Draft Land Use Recommendations supports many of our 2030 vision goals. However, our comprehensive vision cannot be realized without implementing the full-range of new resources and tools initially recommended in our vision document. A concurrent commitment from the City to develop these resources and tools should accompany the Livable South Downtown changes.

In examining the Draft Land Use Recommendations, the Vision 2030 Group requests that the city address the following four issues that will be elaborated in the following letter:

1. Financial Tools
  - Historic TDR's
  - Low-income TDR
  - Bonus programs
  - Growth Related Fund
  - Incentive zoning
2. Zoning: increase housing opportunities
  - Japantown zoning
    - Green Street setbacks
  - Historic Core
  - South of Charles Street
3. Preserving our small retail business climate
  - Limit
  - Formula Business Ordinance
4. Implementation
  - A dedicated city staff person to implement various tools and programs for the neighborhood.

We appreciate the work that DPD staff has done thus far. We look forward to your response to this letter.

Sincerely,

## Vision 2030 Group

In previous letters written to DPD, the Vision 2030 Group has provided the city with a list of neighborhood goals we would like the city to address in the Livable South Downtown Planning Study. In sum, the Vision 2030 Group wishes to see pedestrian-friendly streets safe from illegal activities, more people living in the neighborhood, new and improved open spaces, a diverse array of retail stores, the restoration of derelict buildings, and a balanced mix of neighborhood housing options, ranging from condos for empty nesters to affordable family housing units. The Vision 2030 Group has developed a list of programs and policies that we request the city employ to achieve the myriad of goals outlined in our vision.

Significant to our vision is a residential population comprised of 1/3 people earning 50% or below median income, 1/3 people earning 50-100% median income, and 1/3 people earning 100% and above median income. In order to achieve this goal, available affordable housing (both existing and new units) must be equally available at each of these three levels. The city supports the Comprehensive Planning goals for new housing, which is 20% for 50% below median income, 17% for 50-80%, 27% for 81-120%, 36% for 120% and above. The City and the Vision 2030 Group share the concept that we should avoid displacing existing affordable housing units.

In the Draft Land Use Recommendations, the city has stated that they have several of the same interests as our community, such as creating density, developing & preserving our affordable housing stock, supporting balanced development, sustaining our small business environment, and rehabilitating our dilapidated vacant and substandard buildings. In this document, additionally, the city supports several tools we have advocated for, such as Incentive Zoning, Transfer of Development Rights, a formula business ordinance, and the expansion of our green street network. The Vision 2030 Group, however, feels the strategies recommended by the City are not yet sufficient to achieve the goals outlined by our 2030 vision.

## Financial Tools

In our analysis, the financial programs proposed in the Draft Land Use Recommendations will not achieve the City's desired balanced housing goals. The incentive zoning program will produce far less than 20% of the affordable new construction units desired in our stated goals. The TDR and bonus programs will not make up the 80% deficit. In addition, the historic TDR program is too vague and unlikely to be sufficient in preserving our historic buildings or preventing displacement of low-income residents. It is also unclear if there are sufficient tools to improve and increase public open spaces for the community.

The Vision 2030 Group requests the City adopt the full-range of following recommendations to help achieve the goals of both the City and the Vision 2030 Group.

1. **Growth Related Fund:** The property taxes in Japantown/Chinatown ID/Little Saigon will significantly increase as development occurs. Some of this development will occur due to the Plan's zoning recommendations for increased heights in several areas. We request that an increment

of the increase in property tax revenue be returned to the Japantown/Chinatown ID/Little Saigon neighborhood to support the expansion of open spaces, streetscape improvements, green streets, and affordable housing Recommendation:

- a. Establish a LSDT Growth Related Fund funded from the increased City portion of property taxes generated from the LSDT planning area to meet the affordable housing & community economic development goals established in the LSDT area, including to address the C/ID 2030 goals. The Growth Fund should be established with **50%** of the annual increased taxes collected by the City over the current year baseline of property tax collections in the LSDT area. Uses of the fund may include: affordable housing, economic development activities to support small businesses, landbanking for public benefit purposes, open space improvements/acquisition, pedestrian/public safety improvements, and other activities providing public benefits.
2. **Historic TDR program:** The buildings in the ID are a valuable resource for housing, commercial/retail space, and community amenities. The City's proposed historic TDR program does not maximize resources to provide building owners with the necessary financial support to renovate substandard and vacant buildings. Historic TDR proceeds are only available if the proceeds are used to finance the renovation of the historic properties. Recommendations:
  - a. Exempt all street level retail in FAR calculations.
  - b. Establish 3 Commercial FARs as the minimum available for all historic buildings in the historic district.
  - c. Allow historic buildings to transfer additional TDRs through the Low Income Housing TDR program, if there are actual TDRs available. These proceeds would need to be used for renovation for low income housing in the building.
  - d. Relocation requirements should apply for residents and commercial tenants of all buildings utilizing the Historic TDR program.
3. **Low income Housing TDR and Housing Bonus programs:** The low-income housing TDR and Housing Bonus programs should be used as a financial tool for the neighborhood and contribute to our 2030 balanced development, affordable housing goals. The program should mirror the downtown TDR and Housing Bonus programs. Recommendations:
  - a. All qualifying low-income housing properties shall have a minimum of 3 Commercial FARs to transfer, exempting required street level retail calculations.
  - b. In addition to the Commercial FAR, low income housing projects (new or preservation) should be able to sell, if available, Low Income Housing TDRs, either at the time of development, or to finance future renovations (city funded low income housing projects have 50 year covenants, and will need to be renovated before the term of the covenants; having TDRs could finance future renovations). (ie. Low income projects in historic buildings could sell commercial FARs & LIH TDRs)
  - c. Allow the option for the sale of available TDRs in the ID for new construction of affordable, low income income housing.
  - d. Allow Housing Bonus funds to fund both new construction and preservation of existing low income housing.
  - e. Street level retail and housing should be exempted from the base calculation of transferable FAR.
  - f. The boundaries of the TDR and Housing Bonus programs should be amended to include the entire ID, including areas east of the freeway.
  - g. Prioritize the use of TDR & Housing Bonus proceeds to meet public benefit objectives within the ID, especially affordable low income housing development, or other identified community public benefits.

4. **Incentive Zoning:** Establish an incentive zoning program that encourages the production of affordable housing pursuant to HB 2986. Encourage the on-site production of affordable housing, but allow for payment-in-lieu options, which should focus on the development of the affordable housing within the immediate area.

## Zoning

Our Vision 2030 goal is to increase the number of housing units built in the neighborhood. Currently, the LSDT zoning and land use recommendations will not promote density in several areas that represent substantial opportunities for additional housing. The Vision 2030 Group requests the City adopt the following recommendations.

1. **Japantown:** We support the LSDT's proposed 240' height recommendation. However, we believe the proposed setback requirements would discourage development from occurring at these higher heights. In addition, some property owners are concerned that lowering the incentive zoning bases (from 120' to 100') is a 'property taking'. Recommendations:
  - a. For residential buildings, reset the incentive zoning base to 120' and 150', depending on the parcel's current zoning heights.
  - b. Eliminate the 10' alleyway setback.
  - c. Provide an alternative to the 20' green street setback at 45' and above; in its place, provide a 6' setback of the whole building, creating a 17' sidewalk to facilitate Green Street goals and improve pedestrian amenities. The developer must pay for the green street improvements in the 6' setback area, but the design must go through a design process that allows community input. The new design must demonstrate public benefit versus an enhancement to a private space – for example, it must be a permanent improvement to the physical environment (not a café for a business – though that would not be prohibited).
  - d. Eliminate 35%/40% building coverage at 65'/45' feet. Instead, we propose a 35% building coverage at the heights of 120' and above.
2. **South of Charles Street:** The development of housing south of South Charles Street is critical to our goal of promoting a vibrant community. Recommendation:
  - a. Extend the IDM 85-150' zone south of South Charles Street to Royal Brougham. Or change zoning to SDM 160', as highlighted in Alternative 3 in the DEIS. Housing must be an allowed use.
3. **Historic Core:** Additional resources must be provided to restore the community's historical buildings. A combination of additional FAR to sell through the historic TDR program and increased heights can provide building owners with the necessary resources to rehabilitate substandard and vacant buildings. Recommendation:
  - a. Change zoning to our original recommendation of 85'-125', with 20' setbacks at 45' above for all buildings that exceed 85' on each side of the street the building faces.

## Preserving our small retail business character

Much of our community's unique character is derived from our small, ethnic businesses. Many 2030 group members support stronger regulations to prevent the displacement of small neighborhood businesses in the favor of formula retail business, especially in the Little Saigon community.

1. **Little Saigon Community** is facing major changes due to the types of land use recommendations on the horizon, as well as a possible new regional development in the southeast part of the neighborhood. Consequently, the neighborhood is looking for tools to help preserve its small business character. We would like to discuss with the City the similarities and differences between the proposed DMR/C and IDM/NC2. Recommendation:
  - a. Formula retail businesses ordinance for the whole Little Saigon community, modeled after San Francisco's formula business ordinance. (include web link)
  - b. Universally applying the 25,000 sf retail/50,000 sf grocery store use limits throughout the Little Saigon community.

## **Implementation**

After the plan is approved by the City, many 2030 members are concerned that other goals stated in the document will not be implemented, which include but are not limited to: public safety, open space improvement and acquisition, green street improvements, balanced development, a transportation strategy, gateway intersection improvements, sidewalk vending, pedestrian connections, dumpster free alleyways, small business support, family housing support, and public art.

**Proposal 1:** Consequently, the neighborhood wants the City to dedicate a full time employee city liaison to this community to help implement the various programs to make this community truly livable.